

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

**WASTE MANAGEMENT DIVISION  
RCRA ENFORCEMENT OFFICE  
RCRA COMPLIANCE EVALUATION INSPECTION REPORT**

<b>Purpose:</b>	RCRA Compliance Evaluation Inspection
<b>Facility:</b>	Brenntag West, Inc.
<b>Location:</b>	10747 Patterson Place Santa Fe Springs, CA 90670
<b>Mailing Address:</b>	Same
<b>EPA ID Number:</b>	CAR 000 050 104
<b>Date of Inspection:</b>	February 24, 2004
<b>EPA Representatives:</b>	Cameron McDonald Environmental Scientist (415) 972-3308  Clint Seiter Environmental Protection Specialist
<b>CUPA Representative:</b>	Richard Kallman, PE, REA Environmental Protection Specialist City of Santa Fe Springs Headquarters Fire Station (562) 906-3810
<b>Facility Representatives:</b>	Thomas J. Bajema Director of Operations (562) 777-9335
<b>Report Prepared by:</b>	Cameron McDonald
<b>Report Date:</b>	March 19, 2004

## **Introduction**

The purpose of the February 24, 2004 Compliance Evaluation Inspection (CEI) was to determine Brenntag West, Inc.'s ("Brenntag" or "the facility") compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Title 40, Parts 261-265, 268, and 279; the California Health and Safety Code, Division 20, and the California Code of Regulations (CCR), Title 22, Division 4.5.

EPA was the lead agency during the inspection. A member of California's Certified Unified Public Agency (CUPA), Richard Kallman also with the Santa Fe Springs Fire Station, accompanied EPA during the inspection.

## **Background**

Brenntag West is a full line chemical distribution company. Brenntag provides a broad range of custom blending services of dry and liquid products for various customers. Products are brought onto the facility in bulk via rail tank cars and/or tank trucks. The products are then separated, blended and diluted to order. Brenntag West also handles a complete line automotive and industrial lubricants, and white oils.

The facility started operations at this location in April of 1998. The facility covers approximately 11 acres and is in operation 24 hours a day, seven days a week. The tank farm, or area of chemical blending, is in operation from 5:00 am until 5:00 p.m., Monday through Friday. Brenntag employs approximately ninety-five (95) employees. Sixteen (16) of these employees work at the tank farm and two of the employees are involved in the handling of hazardous waste.

## **Regulatory History**

The facility submitted a Notification of Regulated Waste Activity on March 10, 1999. At that time, the name of the facility was Soco Lynch Corporation. In May of 2001, Soco Lynch was acquired by Brenntag Stinnes Logistics and the facility's name was changed to Brenntag West, Inc. EPA does not have any documentation of the name change.

The facility was originally listed on the Notification as a Small Quantity Generator (SQG) of D001, D002, D003, D005, D035, D039 and D040 characteristic hazardous wastes. An EPA database that tracks facilities that generate RCRA hazardous waste shows Brenntag as a Large Quantity Generator (LQG) of RCRA hazardous waste.

The EPA database also tracks state and federal RCRA inspections of RCRA generators. There were no recorded state or federal inspections for this facility.

non-RCRA hazardous waste, floor sweepings. All of the containers were labeled appropriately for both federal and California regulations.

In Area 14, the EPA and CUPA inspectors observed the "pH pit" (Attachment 2, Photo 2). The pH pit is a sump where various objects used for transferring product such as hoses, buckets, flanges are rinsed with water. The sump is connected to a clarifier and a chart recorder which records the pH of the wastewater as it is being released to the sewer. According to Mr. Bajema, this activity is covered by an Industrial Wastewater Discharge Permit issued by the County of Los Angeles (Attachment 3).

The EPA and CUPA inspectors walked around Area 15 and observed one 55-gallon container holding flushed product. The inspectors did not observe any hazardous waste in this area.

#### Hazardous Waste Storage Area

The Hazardous Waste Storage Area (HWSA) is located in Area 9 (Solvent Repackaging). The EPA and CUPA inspectors observed 44 55-gallon containers stacked three containers high in a roped-off section within Area 9 (Attachment 2, Photo 3). The stacked drums did not have the aisle space required in 22 C.C.R § 66265.35 to allow for unobstructed movement. Approximately half of the drums did not have hazardous waste labels or the labels were not visible to the inspectors due to the stacking of the drums. The information written on several of the hazardous waste labels had faded. At least one of the hazardous waste labels did not have an EPA waste code though the printed information on the label identified it as a RCRA waste.

Brenntag West has agreed to create a HWSA that is separated from the production areas and can be fenced and locked. The facility plans to re-arrange the facility grounds to create sufficient space for the HWSA. They are coordinating with the Santa Fe Springs Fire Department while on this project.

The inspectors observed six 55-gallon containers identified as SoCal Wash (Attachment 2, Photo 4). According to Mr. Bajema, standard operating procedures for the facility is to flush the transfer lines that move one product from a tank with a second or new product that is compatible to the first product to a bucket or a drum (55-gallon container). Usually both products are components for lacquer thinners or solvents. The "flush" is not considered a waste upon generation by the facility. Brenntag containerizes the solvent mix, profiles each drum and finds a buyer for that mix of solvents. The solvent mix is called SoCal Wash by the facility.

#### Record Review

The inspectors reviewed the hazardous waste manifest records for the past three years. The quantity of hazardous waste shipped off-site places this facility into the Large Quantity Generator (LQG) category. The inspectors requested to also review the facility's contingency plan, any weekly inspection records, the facility's training plan and any training documentation. The facility's contingency plan complied with state and federal regulations.

## POTENTIAL VIOLATIONS

### Labelling

22 C.C.R. § 66262.34(a)(2),  
(a)(3) and (f)  
40 C.F.R. § 262.34(a)(2) and  
(3)

The inspectors observed 44 55-gallon containers holding hazardous waste at the hazardous waste storage area. Approximately half of the containers did not have hazardous waste labels visible to the inspectors or the labels were not visible due to the stacking of the drums.

Facility Response: On Feb. 26, 2004, Brenntag submitted two photographs to EPA demonstrating that the HWSA had been re-arranged. The drums were still stacked at least two high, but all of the drums had been staged to allow for inspection of the labels.

### Aisle Space

22 C.C.R. § 66265.35 as  
referenced by 22 C.C.R. §  
66262.34(a)(4).  
40 C.F.R. § 265.35 as  
referenced by 40 C.F.R. §  
262.34(a)(4)

The 44 55-gallon hazardous waste containers staged at the HWSA were stacked three high on pallets set very close to each other, prohibiting unobstructed movement by personnel.

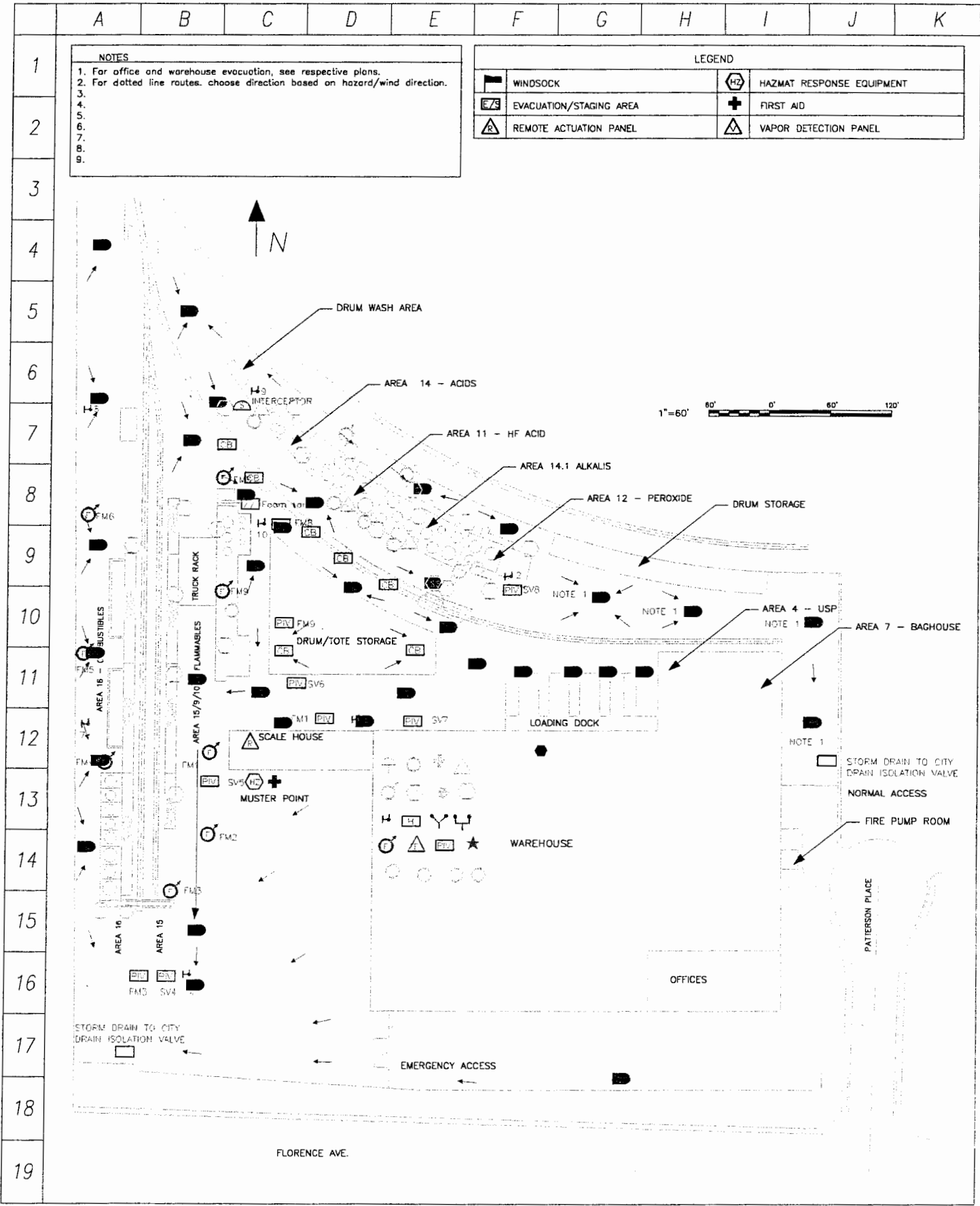
### Personnel Training

22 C.C.R. § 66265.16(d)(1),  
(2) and (3) as referenced by  
22 C.C.R. § 66262.34(a)(4).  
40 C.F.R. § 265.16(d)(1), (2)  
and (3) as referenced by 40  
C.F.R. § 262.34(a)(4)

Brenntag did not have job titles or job descriptions that included necessary training for those two employees.

**ATTACHMENT 1**

**FACILITY DIAGRAM**



**ATTACHMENT 2**

**PHOTOGRAPH LOG**

Compliance Evaluation Inspection Field Photograph Log  
Brenntag West, Inc., Santa Fe Springs, California



Photo 1 - Satellite accumulation area in Area 7, two drums are visible in this photo.



Photo 2 - pH pit for flushing of various items.



Compliance Evaluation Inspection Field Photograph Log  
Brenntag West, Inc., Santa Fe Springs, California



Photo 3 - Hazardous Waste Storage Area, stacked drums.



Photo 4 - Soco Wash drums, for re-sell.

**ATTACHMENT 3**

**BRENNTAG WEST  
INDUSTRIAL WASTEWATER DISCHARGE  
PERMIT**

## OF LOS ANGELES COUNTY

555 Workman Mill Road Whittier, CA 90601 1400

Mailing Address: P.O. Box 4998 Whittier, CA 90607-4998

Telephone (562) 699 7411 FAX (562) 699 5422

www.lacsa.org

CHARLES W. CAPPY

Chief Engineer and General Manager

August 19, 1999

File: 18-99-15143C

Account No. 2036496

Mr. John R. Price  
City of Santa Fe Springs  
11710 E. Telegraph Road  
Santa Fe Springs, CA 90670

Dear Mr. Price:

Industrial Wastewater Discharge Permit No. 15143

Soco-Lynch Corporation  
10747 Patterson Place  
Santa Fe Springs, CA 90670

Enclosed are three (3) approved sets of plans and copies of the approved Industrial Wastewater Discharge Permit for the subject company. Please review these for compliance with your requirements, and retain the copies you require for your files. The applicant's copy of the approved plans and Industrial Wastewater Discharge Permit, along with a copy of this letter and requirement list, should be forwarded to the applicant. A copy of this letter is forwarded to the applicant as notification of the Sanitation Districts' permit requirements, which are in force from the current date. If any additional permit requirements are issued to the applicant by your agency, copies should be forwarded to the Sanitation Districts for our records. The approved plans consist of:

1. Site Utilities Waste and Water
2. Site Utilities Hazardous Waste Piping Containment Piping
3. Piping and Instrument Diagram Area 18 (Drum & Tote Washing Station)

Approval of the permit is subject to compliance with all applicable Ordinance requirements, upon any corrections shown in red on the drawings, and upon the items indicated on the attached requirement list. Failure to comply with all items on the requirement list invalidates this approval and issuance. Invalidation of this permit will result in the applicant being deemed to be operating without a valid permit and subject to immediate discontinuance of sewer services for industrial operations. Successful compliance with all conditions of approval will result in a formal approval that will expire five (5) years from the date of this letter.

Charles W. Carry, Chief Engineer and General Manager  
1955 Workman Mill Road, P.O. Box 4998, Whittier, California 90607

## INDUSTRIAL WASTEWATER DISCHARGE PERMIT

### REQUIREMENT LIST

COMPANY NAME: Soco-Lynch Corporation

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NUMBER: 15143

ACCOUNT NUMBER: 2036496

DATE OF APPROVAL: August 19, 1999

EXPIRATION DATE: August 19, 2004

The approval and issuance of this permit is being made conditionally and subject to Soco-Lynch Corporation being in compliance with all indicated items on this list. Satisfactory evidence of compliance with these conditions should be supplied to the Sanitation Districts where requested. Satisfactory evidence will consist of a minimum of written notification signed by a responsible company official, and in some cases may involve the submission of additional drawings and data, or verification by a Districts representative. Failure to comply with all items on the requirement list, including all deadlines specified, invalidates this approval and issuance. Invalidation of this permit will result in Soco-Lynch Corporation being deemed to be operating without a valid permit and subject to immediate discontinuance of sewer services for industrial operations.

1. This industrial wastewater discharge permit is issued only for the discharge of treated wastewater from cleanup of facility, container and equipment rinsing and boiler blowdown. The discharge of any other type of waste will require prior approval from the Sanitation Districts. This approved permit will expire five (5) years from the date of the accompanying transmittal letter.
2. The permittee is required to notify the Sanitation Districts of any change in the status of the subject facility, if ownership or operating responsibility changes, or if the industrial waste connection is legally abandoned.
3. A new permit application must be submitted when there is a significant change in wastewater quantity (25% or more) or quality from that given in the approved permit information. The completed application should be submitted to the local governmental agency for initial processing prior to Sanitation Districts' review. Approval must be obtained prior to any construction of new facilities.
4. Waste haulers reports must be obtained and kept on file for a period of at least four (4) years for any solid wastes from the wastewater pretreatment system and liquid wastes leaving the plant other than in the sewer system. These reports must be made available to representatives of the Sanitation Districts upon request.

... sampling point at the western corner of the facility is hereby designated as the legal sampling point for Soco-Lynch Corporation. The permittee is responsible for maintaining and cleaning the sampling point to prevent any build-up of oil and grease, sediment or sludge; failure to do so does not invalidate sampling test results. Analytical results from samples taken from this location according to accepted sampling procedure shall be accepted as binding. Safe and convenient access to the sampling point must be provided for representatives of the Sanitation Districts. Should Districts' staff determine that the sampling location is unsafe, difficult to access or require modification, Soco-Lynch Corporation must propose alternatives which will provide a sampling facility acceptable to the Districts.

10. The Districts' personnel may provide a split of any composite sample collected if sufficient sample volume is available. Districts' personnel may also provide split, concurrent, or sequential grab samples. These samples will be left with a designated company representative. If the designee is not available, these samples will be left with whomever is available.

The permittee is required to follow appropriate preservation techniques, analytical procedures, and holding periods specified in 40 CFR 136, if the analytical test results from these samples are to be used for compliance or surcharge reporting purposes. Failure to follow the prescribed procedures will invalidate the test results.

11. The permittee is advised that additional industrial wastewater pretreatment equipment may be required if inspection or monitoring indicates prohibited materials are discharged to the public sewer.
12. Any plans for changes in equipment or processes must be submitted (for approval before implementation) **to the Sanitation Districts.**
13. The permittee should provide trained personnel for proper operation and regular maintenance of all components of the existing pretreatment system to ensure compliance at all times with applicable industrial wastewater effluent limits.
14. Self-monitoring of the industrial wastewater must be performed at the intervals indicated on the enclosed Self-Monitoring Requirement Form and reported on the Self-Monitoring Report (SMR) form. The Districts will send the necessary SMR forms before each reporting period. All indicated analyses must be performed by a State or Sanitation Districts' certified laboratory. The certification section of the SMR form must be completed and signed by a responsible company official. For each reporting period, the completed SMR form and the corresponding laboratory report must be submitted to the Districts' Industrial Waste Section no later than the due date indicated on the form. The wastewater samples analyzed must be collected in such a way that they are representative of the total discharge generated by a typical day's operations. Each representative sample (composite and/or grab) should be collected over one 24-hour period and analyzed for all parameters in Table 1 of the Self-Monitoring Requirements form. All representative samples must meet all applicable limits. It is the responsibility of Soco-Lynch Corporation to submit results from any additional self-monitoring, and to notify the Districts of any other toxic materials which are known to be present in the wastewater.

21. An automatic continuous pH recording instrument must be installed to monitor the pH of the wastewater discharge stream entering the public sewer. The probe for the pH instrument must be located in sampling box. pH records for at least the previous 180 days of operation must be kept on file at the discharge address and must be made available for inspection by representatives of the Districts at any time during business hours.

The pH equipment must be regularly calibrated and maintained in good working order. The probe and recorder must be in place and operating 24 hours per day, every day of the year, except for periods of routine pH equipment maintenance. During periods of extended maintenance, either calibrated back-up equipment must be used or hourly pH readings must be manually recorded during operating hours.

On a weekly, or more frequent basis, the pH chart must be annotated with the following information: date, time, name of person annotating the chart, and the pH reading from a secondary sensing device such as pH paper or an alternate calibrated pH meter. In addition, whenever the equipment is calibrated, the chart must be annotated with the above information and the word "calibration". Periods of maintenance or abnormal operation should be indicated on the pH chart and detailed in the facility's log book. The pH chart paper should have a scale of 0 to 14.

22. This approval of the existing pretreatment system by the Sanitation Districts is for only the general concept presented. The proper maintenance and operation of the system is the responsibility of the permittee and his contractors.

Brenntag Pacific, Inc.

**BRENNTAG**

# Fax

To: Cameron McDonald From: Tom B.  
Fax: 415/ 947- 3530 Pages: 5  
Phone: 415/ 992- 3308 Date: 3-22-04  
Re: \_\_\_\_\_ CC: \_\_\_\_\_

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• Comments:

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Brenntag Pacific, Inc.  
10747 Patterson Place  
Santa Fe Springs, CA 90670

Telephone: 562 903-9626  
Fax: 562 903-9431

## **ATTACHMENT 4**

### **BRENNTAG WEST SUBMITTAL OF INFORMATION**



Brenntag West, Inc.  
10747 Patterson Place Santa Fe Springs, Ca. 90670  
Hazardous Waste Storage Area



2-25-04 our facilities hazardous waste storage area was reconfigured to allow inspection of each waste container and each waste container label. The containers were arranged in two rows with labels facing towards the aisle to facilitate inspection. Figure 1 depicts the

storage area looking SE. Figure 2 depicts the storage area looking NW, showing the aisle space provided for inspection. This is a temporary measure until a more suitable waste storage area can be constructed.

**Figure 1**



**Figure 2**